

Through the course of investigation and discovery, Defendant, PMI has determined that the underlying facts of this case support a cross-claim against for indemnity or, alternatively, contribution under the general maritime law against Heather Lynn and Blake. Accordingly, Defendant, PMI, moves for leave to file a cross-claim in this cause of action. A copy of the proposed Original Cross-Claim is attached hereto as **Exhibit A** and incorporated herein by reference for all purposes.

II.

Co-Defendants, Heather Lynn and Blake have been apprised of the filing of this Motion and do object to same. Counsel for Plaintiff is unopposed.

III.

Leave sought by this Motion will not unduly prejudice Co-Defendants, Heather Lynn and Blake, or delay the trial of this cause. Indeed, the requested leave is necessary as a matter of judicial economy so that the Court may adjudicate all claims among the parties herein relative to the matters in dispute.

WHEREFORE, Motion Considered, Defendant, Production Management Industries LLC, prays that this Motion be granted and for such other and further relief, both general and special, at law and in equity, to which it may show itself justly entitled to receive.

Respectfully submitted,

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### **CERTIFICATE OF CONFERENCE**

This is to certify that the undersigned communicated with counsel regarding the foregoing, and the Motion is opposed by one or more parties.

/s/ Ronald L. White

Ronald L. White

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that service of the foregoing was on this date accomplished on all known counsel of record in accordance with the Federal Rules of Civil Procedure on July 6, 2007.

/s/ Ronald L. White

Ronald L. White